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Objection due date: January 3, 2022
Hearing date: January 20, 2022, at
2:00 pm.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

SEARS HOLDING CORPORATION, et al.

Case No.: 18-23538 (RDD)

Debtors.

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OBJECTION OF LIFEWORKS TECHNOLOGY GROUP TO SEARS HOLDING
CORPORATION'S FORTY-FIRST OMNIBUS OBJECTION TO PROOFS OF CLAIM
AND/OR BALLOT (RECLASSIFY OR DISALLOW)

Lifeworks Technology Group (the "Creditor" or "Lifeworks"), by its counsel, Lazarus & Lazarus, P.C., submits its objection to the Forty-First Omnibus Objection to Proofs of Claim and/or Ballots (Reclassify or Disallow) (The "Debtors' Objection") of the debtors, Sears Holding Corporation (the "Debtors").

GENERAL BACKGROUND

1. Lifeworks is a creditor of the Debtors.
2. On October 15, 2018 (the "Commencement Date") and continuing thereafter, each of the Debtors commenced with the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") a voluntary case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections

1107(a) and 1108 of the Bankruptcy Code.

3. Lifeworks submits this claim in opposition to the Debtors' Objection (Docket No. 10134) dated December 7, 2021, objecting to Lifeworks claim No. 11158 ("Lifeworks' Claim No. 11158") for the stated reason that "*supporting documentation indicates that the claims are not entitled to non-administrative priority*".

PROCEDURAL HISTORY

4. On or about December 20, 2018, Lifeworks timely filed a proof of claim ("Lifeworks' Claim No. 6553"), which asserted an unsecured amount of \$17,703.38 for unpaid invoices for goods provided by Lifeworks. Lifeworks' Claim No. 6553 also included a claim pursuant to 11 U.S.C. Section 503(b)(9) in the amount \$1,484.40 for unpaid invoices for goods received by the Debtors from Lifeworks within twenty days before the Petition Date.

5. On November 12th, 2019, this Court entered an Order expunging Lifeworks' Claim No. 6553, but further indicating that Lifeworks' Claim No. 11158 was the "Surviving Claim". Docket No. 5995-1, at page 2 of 3.

RESPONSE TO OBJECTION TO CLAIM NUMBER 11158

6. The Objection sets forth the reason for the requested disallowance of Lifeworks' Claim No. 11158 "(i) i.e., "*supporting documentation indicates that the claims are not entitled to non-administrative priority*."

7. Lifeworks submits Exhibit A in opposition to the Objection. Exhibit A consists of:

Invoice #	Amount of Invoice	Fed Ex Tracking # and/or Freight Bill #
402443, dated September 27, 2018	\$720.00	455244563217

401979, dated September 24, 2018	\$764.40	455244560181
400107, dated September 10, 2018	\$360.00	455244550489
400078, dated September 10, 2018	\$5,424.00	
397753, dated August 30, 2018	\$360.00	455244544358
397754, dated August 27, 2018	\$1,982.40	455244540260
397158, dated August 20, 2018	\$1,197.60	455244537492
396409, dated August 17, 2018	\$720.00	455244537209
396410, dated August 17, 2018	\$360.00	455244536912
385294, dated June 25, 2018	\$5,854.80	4594389085, ship date June 25, 2018

8. Lifeworks does not object to the disallowance of Lifeworks' claims insofar as the claim seeks administrative priority status for \$1,484.40 of the \$17,703.38 total claim.

9. Lifeworks' objection to the requested disallowance is solely to the extent that the Objection seeks to disallow Lifeworks' claim entirely. Such disallowance is contrary to the proofs set forth in Exhibit A hereto.

WHEREFORE, for the reasons stated herein, Lifeworks respectfully requests that the Court enter an order denying the Debtors Forty-First Omnibus Objection to Proofs of Claim/Ballots, and for such other, further and different relief as this Court deems just and proper.

Dated: New York, NY
December 30, 2021

Lazarus & Lazarus, P.C.

By: _____
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